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## **U.S. Department of Justice**

United States Attorney Southern District of New York

86 Chambers Street New York, NY 10007

September 28, 2023

BY ECF

The Honorable Paul A. Crotty United States Courthouse 500 Pearl Street New York, NY 10007

Re: Knight First Amendment Institute at Columbia University v. U.S. Department of State, No. 23 Civ. 02513 (PAC)

## Dear Judge Crotty:

We write jointly on behalf of Defendant the United States Department of State (the "State Department" or the "Government") and Plaintiff the Knight First Amendment Institute at Columbia University (the "Institute") to provide a status report in the above referenced Freedom of Information Act ("FOIA") matter.

As the parties advised in their last status report on July 28, 2023, ECF No. 16, the State Department has completed its search for records potentially responsive to Plaintiff's FOIA Request and identified approximately 216 potentially responsive records, including 16 Excel files. These documents are estimated to total 194,189 pages<sup>1</sup> or 1,633 pages excluding the Excel files.

Since that time, the State Department has sent Plaintiff the following release letters:

<u>August 4, 2023</u> – the State Department advised that it had processed 698 pages of potentially responsive material, and had not identified any records responsive to the FOIA request.

<u>September 15, 2023</u> – the State Department advised that it had processed 288 pages of potentially responsive material, and had not identified any records responsive to the FOIA request.

The State Department will continue processing records and making rolling productions every six weeks.

The parties respectfully request to submit their next joint status report to the Court on December 15, 2023.

<sup>&</sup>lt;sup>1</sup> Due to the manner in which the software counts pages of Excel files, the number of estimated pages for the Excel files may be significantly greater than the actual page count.

We thank the Court for its consideration.

Respectfully,

DAMIAN WILLIAMS United States Attorney

By: /s/ Dominika Tarczynska

DOMINIKA TARCZYNSKA Assistant United States Attorney 86 Chambers Street, Third Floor

New York, NY 10007 Tel: (212) 637-2748 Fax: (212) 637-2686

dominika.tarczynska@usdoj.gov

cc: Jennifer Jones (via ECF) Alexander Abraham Abdo (via ECF) Attorneys for Plaintiff